

REMARKS/ARGUMENTS

Reconsideration and allowance of this application are respectfully requested. Currently, claims 1-19 are pending in this application.

Rejection Under 35 U.S.C. §112:

Claims 1, 6 and 11 were rejected under 35 U.S.C. §112, second paragraph, as allegedly being indefinite for failing to particularly point and distinctly claim the subject matter which Applicant regards as the invention. In particular, the Office Action states "As per claim 1 line 16 recites '...to a storage area of the line drawing data storing means...' and line 19-20 recites '...to a storage area of the line drawing data storing means....'" Claim 1 has been clarified to recite "a storage area" and "another storage area." Claims 6 and 11 have been editorially clarified in a similar fashion. Applicant therefore respectfully requests that the rejection under 35 U.S.C. §112, second paragraph, be withdrawn.

Rejection Under 35 U.S.C. §102:

Claims 1-11 were rejected under 35 U.S.C. §102(b) as allegedly being anticipated by Suzuki (U.S. '175). Applicant respectfully traverses this rejection.

For a reference to anticipate a claim, each element must be found, either expressly or under principles of inherency, in the reference. Applicant respectfully submits that each element of the claimed invention is not found in Suzuki. For example, Suzuki fails to disclose "detecting an outline portion of an image as an outline area, with respect to an area other than the ink line area and the neighboring area in the original image," as required by independent claim 1

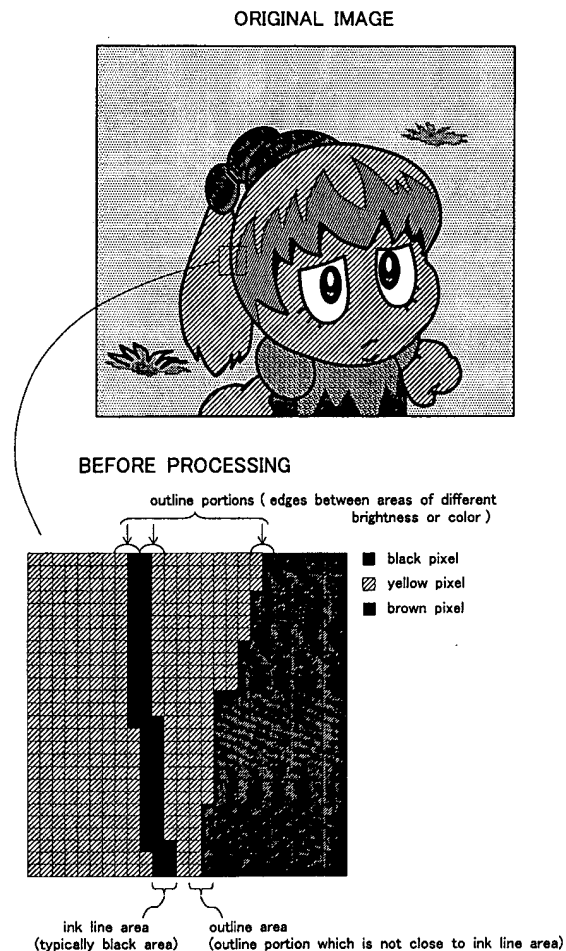
FUJITA

Application No. 10/693,954

April 12, 2005

and its dependents. Independent claims 6 and 11 and their respective dependents require similar limitations.

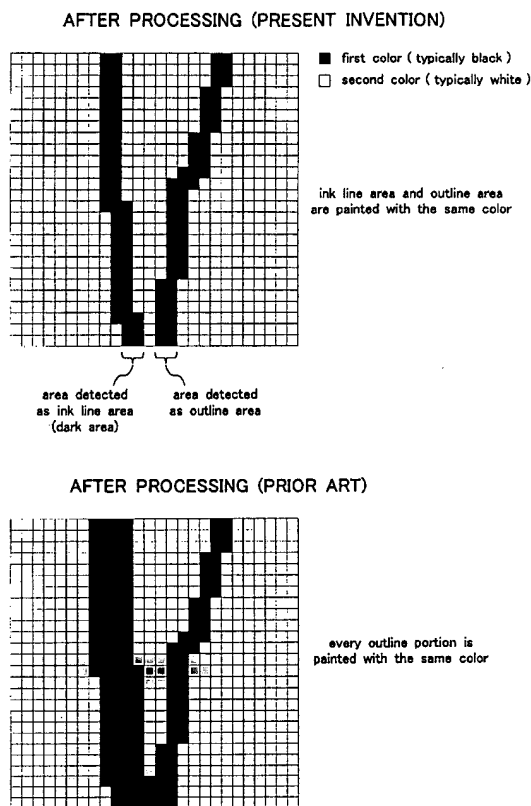
In order to facilitate an understanding of the present invention, Applicant has provided below the following figures which graphically describes the present invention and contrasts the present invention with the “prior art” described in the “Description of Background Art” section of the application (pages 1-2 of the application).



FUJITA

Application No. 10/693,954

April 12, 2005



Page 3, lines 9-12 of the Office Action alleges “as an ink line area see for example figure 3 block s1-3 and s1-4 for the first and subsequent contour (see figures 4-9 for the dark lines with smaller brightness than the neighboring areas which is white).” Applicant respectfully disagrees with the apparent allegation that Figs. 3-9 of Suzuki discloses the above noted limitation of claim 1. While Suzuki may disclose ink line areas formed by contours of an image, Suzuki fails to further teach or suggest detecting an outline portion of an image as an outline area with respect to an area other than the ink line area and the neighboring area in the original image. While Suzuki may therefore disclose finding ink line areas, Suzuki does not also disclose detecting an outline area other than the ink line areas.

FUJITA

Application No. 10/693,954

April 12, 2005

Independent claim 1 further requires “detecting an area whose brightness is smaller than a predetermined value.” Suzuki fails to disclose this feature. For example, Suzuki (col. 8, lines 17-25 and col. 8, lines 45-57) discloses a method of detecting a contour by blending the color values of pixels in a given array surrounding a pre-selected point, and finding the pixel with the value closest to 0.5 among the pixels in a detection range. In Figs. 4-9 of Suzuki, a color of an outline is a mixed color of a color of the car and a color of the background. Suzuki also fails to disclose similar features required by independent claims 6 and 11 and their respective dependents.

Accordingly, Applicant respectfully requests that the rejections of claims 1-11 under 35 U.S.C. §102(b) be withdrawn.

New Claims:

New claims 12-19 have been added to provide additional protection for the invention. New claim 12 requires, *inter alia*, “detecting an outline area of the original image, the outline area being outside of the ink line area and the neighboring area and having a brightness which differs from an area adjacent to the outline area.” Independent claim 16 requires, *inter alia*, “detecting pixels of an outline area of the original image data, the outline area being outside of the ink line area in the neighboring area, and the outline area pixels having respective brightnesses which differ from pixels adjacent to the outline area pixels.”

Applicant submits that these claims are allowable.

FUJITA

Application No. 10/693,954

April 12, 2005

Conclusion:

Applicant believes that this entire application is in condition for allowance and respectfully requests a notice to this effect. If the Examiner has any questions or believes that an interview would further prosecution of this application, the Examiner is invited to telephone the undersigned.

Respectfully submitted,

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